

Slotnick Declaration Ex. C

January 27, 2017

Linna Chen
Barry Slotnick
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Re: Craig v. Universal Music Group, Inc. et al, 1:16-cv-5439 (JPO)

Barry and Linna,

Please find attached our second production of documents responsive to requests in your deficiency letter, dated November 29, 2016 and pursuant to a subsequent telephone conference between counsel.

1. No documents have been withheld pursuant to any objection.
2. Attached please find a list on recordings and items in Plaintiff's possession. As is evident from Plaintiff's first document production, the Plaintiff learned about the infringements in May to June 2014. The infringing articles came into the Plaintiff's possession in February to March 2016. Please see the attached credit card statements and order pages from various websites offering the items for sale.
3. No documents responsive to this request have been withheld.
4. No documents responsive to this request exist.
5. Around the time when he took photographs, Plaintiff worked part-time as a waiter at TWTF Restaurant Group, as a staff photographer at Hullabaloo magazine, worked as a freelance photographer for Changes, Tigerbeat, 16, Atlantic Records and other companies. Plaintiff does not have possession of contracts or other documents to the effect.
6. Plaintiff does not, at this time, possess previously undisclosed documents that it intends to use. However, Plaintiff reserves the right to supplement this response should additional documents become available.
7. Please note the contact information for persons identified in the Interrogatories. The owners of Morrison Hotel – 1200 Alta Loma Road, West Hollywood, CA 90069 Sardi Klein and the rest of Plaintiff's family may be contacted via undersigned counsel.

Sincerely,

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